

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

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In the Matter of )

AT&T Inc., Cellco Partnership d/b/a Verizon )  
Wireless, Grain Spectrum, LLC, and Grain )  
Spectrum II, LLC Seek FCC Consent to the )  
Assignment of Advanced Wireless Services and )  
Lower 700 MHz Band B Block Licenses and to )  
Long-Term *De Facto* Transfer Spectrum )  
Leasing Arrangements Involving Advanced )  
Wireless Services and Lower 700 MHz Band B )  
Block Licenses )

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WT Docket No. 13-56

SUPPLEMENTAL RESPONSE OF AT&T INC. TO  
GENERAL INFORMATION REQUEST DATED JUNE 13, 2013

July 19, 2013

## **1. REQUEST:**

On page 1 of the Public Interest Statement, the Applicants assert that the spectrum transfers that would occur if the Proposed Transaction were approved would achieve “public interest benefits by putting spectrum to use to benefit consumers and help AT&T and VerizonWireless provide high-quality, high-speed wireless broadband.” For each relevant market, provide:

- a. A detailed description of how the Company would use the spectrum that it would acquire under the Proposed Transaction to provide high-quality, highspeed wireless broadband to consumers, on a standalone basis and in conjunction with any other of the Company’s spectrum holdings.**
- b. The Company’s timeline for deploying the spectrum that it would acquire in the Proposed Transaction.**
- c. A detailed description of the Company’s current and planned deployment of LTE and strategy for spectrum rationalization.**
- d. A discussion of the Company’s plans to provide high-quality, high-speed wireless broadband services in the relevant markets prior to the Proposed Transaction. Provide any supporting material relied on in preparing the response.**
- e. All plans, analyses, and reports discussing, both prior to and after the consummation of the Proposed Transaction, (i.) the Company’s plans to deploy its 700 MHz and AWS-1 and (ii.) efforts of other AWS-1 and 700 MHz licensees in deploying their spectrum.**

## **RESPONSE:**

AT&T is submitting with this Supplemental Response additional documents discussing the Company’s current and planned deployment of its LTE network, including LTE planning presentations dated April 16, 2013,<sup>1</sup> March 11, 2013,<sup>2</sup> February 12, 2013,<sup>3</sup> and December 14, 2012.<sup>4</sup>

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<sup>1</sup> ATT-VZWG00000603.

<sup>2</sup> ATT-VZWG00000770.

<sup>3</sup> ATT-VZWG00000703.

<sup>4</sup> ATT-VZWG00000653.

## **2. REQUEST:**

**On page 2 of the Public Interest Statement, the Applicants contend that “[t]he assignments will allow AT&T and Verizon Wireless each to further rationalize their spectrum holdings and obtain contiguous spectrum in many markets, enabling more spectrally efficient deployments.” Explain and describe in detail, including the period of time envisioned, how the Proposed Transaction would allow the Company to rationalize its spectrum holdings and deploy them more efficiently than it would without the spectrum that it would obtain if the Proposed Transaction were approved.**

**In addition, provide the following information:**

- a. Identify each relevant market where the Company would hold or lease contiguous spectrum as a result of the Proposed Transaction.**
- b. For each relevant market in which the Company would hold contiguous 12+12 megahertz paired spectrum as a result of the Proposed Transaction, provide the timeline for deploying the contiguous spectrum.**
- c. For each relevant market in which the Company would not hold contiguous spectrum as a result of the Proposed Transaction, provide the timeline for deploying the 700 MHz B Block spectrum it plans to acquire.**
- d. Explain and describe in detail how contiguous spectrum enables more spectrally efficient deployments, including but not limited to, any analyses comparing the spectral efficiency, user performance, and capacity characteristics of a 5+5 megahertz LTE deployment with a 10+10 megahertz LTE deployment. Provide any supporting engineering data and documents relied on in preparing the response.**

## **RESPONSE:**

AT&T’s acquisition of the Lower 700 MHz B Block spectrum (the “Subject Spectrum”) will allow AT&T to augment and fill in gaps in its LTE deployment, and make more efficient use of its spectrum holdings through contiguous Lower 700 MHz 10x10 MHz LTE deployments in most areas subject to this transaction. AT&T’s 10x10 MHz deployments will result in faster, higher quality services for AT&T customers.

The AT&T Initial Information Request Response described in detail the theoretical benefits and efficiencies of a 10x10 MHz LTE deployment compared to a 5x5 MHz LTE

deployment.<sup>5</sup> AT&T has leased Subject Spectrum from Verizon Wireless pursuant to short-term leasing arrangements in areas where it had informed the Commission that it could deploy the spectrum within 60-90 days.<sup>6</sup> In these areas where AT&T has deployed the Subject Spectrum as part of a 10x10 LTE deployment,<sup>7</sup> customers have experienced significant improvements in throughput speeds and latency, as well as improved accessibility and retainability.<sup>8</sup> AT&T is submitting with this Supplemental Response documents describing the significant performance improvements enjoyed by its customers in these areas.

#### **4. REQUEST:**

**On page 1 of the Hogg Declaration, Mr. Hogg states that “AT&T believes it can deploy the Subject Spectrum within approximately 60-90 days in markets where AT&T already provides LTE service in the Lower 700 MHz C Block, representing approximately 80% for the total population in the areas where AT&T is acquiring spectrum.”**

- a. Identify the relevant markets where the Company would be able to deploy the spectrum it would acquire in the Proposed Transaction in 60 to 90 days. Provide a detailed explanation of the steps the Company would need to take to deploy the spectrum that it would acquire in the Proposed Transaction in 60 to 90 days.**
- b. Identify the relevant markets where the Company holds but has not deployed its 700 MHz C Block spectrum, and provide a detailed explanation of the steps the Company would need to take to deploy the Lower 700 MHz B Block spectrum in these markets.**
- c. For any relevant market where the Company does not hold Lower 700 MHz C Block spectrum, provide a detailed explanation of the steps the Company would need to take to deploy the Lower 700 MHz B Block spectrum.**
- d. Provide all supporting materials relied on in preparing the responses in 4a. through 4c.**

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<sup>5</sup> Response of AT&T Inc. to General Information Request Dated June 25, 2013 at 10-12.

<sup>6</sup> See Declaration of William Hogg at 1-2 (Feb. 6, 2013).

<sup>7</sup> See also the supplemental response to Request 4, below.

<sup>8</sup> See ATT-VZWG00000813 at slides 3-5; ATT-VZWG00000818 at slides 4-18.

**RESPONSE:**

In his Declaration, William Hogg stated that AT&T could deploy the Subject Spectrum within approximately 60-90 days in markets where AT&T already provided LTE service in the Lower 700 MHz C Block.<sup>9</sup> In fact, as documents previously submitted and additional documents being submitted herewith make clear, after entering into short-term leases of this spectrum from Verizon Wireless, AT&T deployed the spectrum for LTE service in less than 60 days.<sup>10</sup> Construction Notifications, filed June 28, 2013, in the Commission's Universal Licensing System, also show that AT&T has put the spectrum to productive use.<sup>11</sup> AT&T is also submitting additional documents regarding its planning for deployment of the Subject Spectrum for LTE services in those markets where it already provided service over the Lower 700 MHz C Block.

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<sup>9</sup> Declaration of William Hogg at 1-2 (Feb. 6, 2013).

<sup>10</sup> See, e.g., ATT-VZWG000000001 at slide 16 (showing a final deployment date of [BEGIN AT&T HIGHLY CONFIDENTIAL] [END AT&T HIGHLY CONFIDENTIAL] for all thirteen markets); ATT-VZWG00000603 at slide 15 (indicating an anticipated deployment completion date of [BEGIN AT&T HIGHLY CONFIDENTIAL] [END AT&T HIGHLY CONFIDENTIAL]).

<sup>11</sup> See ATT-VZWG00000347; ATT-VZWG00000363; ATT-VZWG00000379; ATT-VZWG00000395; ATT-VZWG00000411; ATT-VZWG00000427; ATT-VZWG00000443; ATT-VZWG00000459; ATT-VZWG00000475; ATT-VZWG00000491; ATT-VZWG00000507; ATT-VZWG00000523; ATT-VZWG00000539. The AT&T Initial Information Request Response contained a list of those CMAs where AT&T stated it could deploy, and had deployed, LTE service within approximately 60-90 days. Response of AT&T Inc. to General Information Request Dated June 13, 2013 at 14. The AT&T Initial Information Request Response also noted that AT&T had deployed LTE service using the Subject Spectrum in three additional CMAs. *Id.* at 15 n.16. Construction Notifications for the Lower 700 MHz B Block licenses in those CMAs are also submitted herewith. See ATT-VZWG00000555; ATT-VZWG00000571; ATT-VZWG00000587.